

STATE OF TENNESSEE

Office of the Attorney General



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TELEPHONE 615-741-3491
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August 28, 2003

Chairman Deborah Taylor Tate
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

**RE: IMPLEMENTATION OF THE FEDERAL COMMUNICATIONS COMMISSION'S
TRIENNIAL REVIEW ORDER, Docket # 03-00460**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of the Office of the Attorney General's Petition to Intervene in the above matter. We request that these documents be filed with the TRA in this docket. Please be advised that all parties of record have been served copies of these documents. If you have any questions, kindly contact me at (615) 741-7833. Thank you very much.

Sincerely,

Timothy C. Phillips
Timothy C. Phillips
Assistant Attorney General

Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**IMPLEMENTATION OF THE
FEDERAL COMMUNICATIONS
COMMISSION'S TRIENNIAL REVIEW
ORDER**

DOCKET NO. 03-00460

PETITION TO INTERVENE

Comes now Paul G. Summers, the Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A) and Rule 1220-1-2-.08 of the Tennessee Regulatory Authority (hereinafter "TRA"), and petitions the TRA to grant the Consumer Advocate's intervention in this proceeding on behalf of consumers and in the public interest. For cause, the Consumer Advocate would show unto the TRA as follows:

1. In order to represent the interests of Tennessee consumers, the Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118(c)(2)(A) to initiate a contested case and to intervene or participate in proceedings concerning public utility matters in accordance with the Uniform Administrative Procedures Act.
2. Only by intervening and participating in this proceeding can the Consumer Advocate work effectively to protect the interests of Tennessee consumers.
3. The release of the Triennial Review Order by the Federal Communications Commission on August 21, 2003 has triggered this proceeding which will consider a number of

issues related to Tennessee's telecommunications market.

4. On August 19, 2003, Chairman Deborah Taylor Tate issued an order which initiated this proceeding to consider and implement the presumptions and various conclusions of the Triennial Review Order and requested interested parties to file petitions to intervene within seven days of the FCC's release of the order.

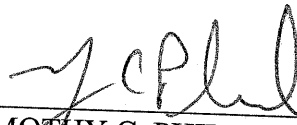
5. The findings and determinations of this proceeding will affect the consumers of Tennessee.

WHEREFORE, the Consumer Advocate prays that the TRA grant the Consumer Advocate's timely filed Petition to Intervene and allow the Consumer Advocate to participate as a party to this proceeding.

RESPECTFULLY SUBMITTED,



PAUL G. SUMMERS, B.P.R. #6285
Attorney General and Reporter

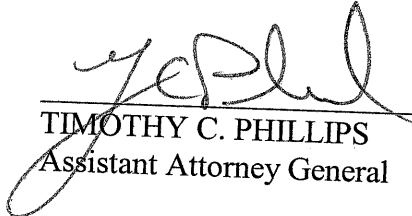


TIMOTHY C. PHILLIPS, B.P.R. #12751
Assistant Attorney General
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Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8700

Dated: August 28th, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was hand-delivered to all interested parties on August 28th 2003.


TIMOTHY C. PHILLIPS
Assistant Attorney General